

IN THE  
UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS

STEPHANIE WILLIAMS and GLENROY )  
WILLIAMS, )  
 )  
Plaintiffs, )  
 )  
v. ) No.  
 )  
AMERICAN AIRLINES, INC., a )  
corporation, and ENVOY AIR, INC., a )  
corporation, )  
 )  
Defendants.

**COMPLAINT**

Plaintiffs Stephanie Williams and Glenroy Williams, through their attorneys, Husain Law + Associates, PC, for their Complaint against defendants American Airlines, Inc., a corporation, and Envoy Air, Inc., a corporation and state as follows:

**COUNT I**

1. Plaintiffs Stephanie Williams and Glenroy Williams are residents and citizens of The Bahamas. Defendant American Airlines, Inc. (“American Airlines”) is a corporation and air carrier which, upon information and belief, is headquartered in Texas. American Eagle, upon information and belief, is the U.S. brand name for the regional branch of American Airlines. Defendant Envoy Air, Inc. (“Envoy Air”) is a corporation and air carrier which, upon information and belief, is headquartered in Texas. Upon information and belief, Envoy Air is a wholly-owned subsidiary of the American Airlines Group which is paid by American Airlines to staff, operate and maintain aircraft used on American Eagle flights that are scheduled, marketed and sold by American Airlines.

2. Plaintiffs were injured as the proximate result of an accident in the course of international carriage by air by defendant American on October 24, 2020. Plaintiffs' claims against defendants American Airlines and Envoy Air arise under the Convention For the Unification of Certain Rules For International Carriage By Air, known as the Montreal Convention. This Court therefore has subject matter jurisdiction over this action under 28 U.S.C. § 1331.

3. The United States is a proper jurisdiction in which to bring this action against American under the Montreal Convention as defendants American Airlines and Envoy Air are air carriers which are domiciled and have their principal place of business in Texas.

4. Venue is proper in this District under 28 U.S.C. § 1391.

5. On October 24, 2020, plaintiffs were passengers onboard an aircraft being operated on that date by defendant Envoy Air as American Eagle Flight AA4194, an international flight from Miami, Florida to Freeport, Bahamas. Plaintiffs had purchased tickets through defendant American Airlines (the contracting carrier), but the flight was operated by defendant Envoy Air (the actual carrier).

6. Upon landing at the Freeport-Grand Bahama International Airport, Bahamas, American Eagle Flight AA4194, suffered a runway excursion. American Eagle Flight AA4194 skid off the runway due to the failure of the rear landing gear. ("The Accident")

7. As a direct result of The Accident, plaintiffs suffered injuries physical and psychological in nature. Plaintiffs have sustained and will sustain in the future, medical bills, lost earnings, and great pain and suffering and emotional distress.

WHEREFORE, plaintiffs Stephanie Williams and Glenroy Williams pray for a judgment against defendants American Airlines, Inc. and Envoy Air, Inc. for an amount in excess of the

minimum jurisdiction amount of this Court, together with costs and such other amounts as may be allowed by law.

Dated: October 24, 2022

HUSAIN LAW + ASSOCIATES. PC

By: /s/Nomaan K. Husain  
One of the Attorneys For Plaintiffs

Nomaan K. Husain (Texas Bar #24000743)  
Husain Law Associates, PC  
5858 Westheimer, Suite 400  
Houston, Texas 77057  
(713) 800-1200  
Nh@hlalawfirm.com